

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

BEN VEAL,

Plaintiff,

v.

RUBBERMAID COMMERCIAL
PRODUCTS, LLC,

Defendant.

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Civil Action No. 1:14-cv-05810

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Ben Veal (“Veal”) and Defendant Rubbermaid Commercial Products, LLC (“Rubbermaid”) hereby jointly requests an extension of time to complete fact discovery by approximately sixty (60) days, *i.e.*, until **December 11, 2015**, and re-set expert discovery accordingly. In support thereof, the parties states as follows:

The parties have exchanged initial discovery. The parties have met and conferred regarding the potential need for supplementing production. The parties have also discussed potential ESI issues. The parties have been working cooperatively in resolving their discovery issues; however, additional time is needed. Fact discovery is currently set to close on October 13, 2015. The parties believe that additional time is needed to complete fact discovery, in particular to resolve the remaining written discovery issues and conduct depositions.

The parties propose the following updates:

Event	Previous Date	New Date
Fact discovery to close	October 13, 2015	December 11, 2015
Plaintiff's expert reports due	November 7, 2015	January 15, 2015
Defendant's expert reports due	December 6, 2015	February 15, 2015
All expert discovery to be complete	March 7, 2016	May 13, 2015

WHEREFORE, Veal and Rubbermaid request this Court extend fact discovery by sixty (60) days and re-set expert discovery accordingly.

Dated: September 17, 2015

Respectfully Submitted,

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 RUBBERMAID COMMERCIAL
 PRODUCTS, LLC

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[PROPOSED] ORDER

Upon consideration of Agreed Motion to Extend Time to Answer or
Otherwise Respond to the Complaint, IT IS HEREBY ORDERED:

1. The motion to extend time to complete discovery is GRANTED; and
2. The deadlines are set as follows:

Event	Previous Date	New Date
Fact discovery to close	October 13, 2015	December 11, 2015
Plaintiff's expert reports due	November 7, 2015	January 15, 2015
Defendant's expert reports due	December 6, 2015	February 15, 2015
All expert discovery to be complete	March 7, 2016	May 13, 2015

Respectfully submitted,

Dated: September 17, 2015

/s/Michael > Haeberle_____
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